

REMARKS/ARGUMENTS

Favorable reconsideration of this application is respectfully requested.

Claims 1-34 are pending in this application. Claims 1, 2, 4-6, 8, 13, 14, 16-18, 20, 25, and 26 were rejected under 35 U.S.C. § 102(a) as anticipated by Applicant's admitted art. Claims 3, 7, 9-12, 15, 19, 21-24, and 27-34 are allowed.

Initially, applicant gratefully acknowledges the indication of the allowance of claims 3, 7, 9-12, 15, 19, 21-24, and 27-34.

Addressing now the rejection of claims 1, 2, 4-6, 8, 13, 14, 16-18, 20, 25, and 26 under 35 U.S.C. § 102(a) as anticipated by applicant's admitted art, that rejection is traversed by the present response.

Applicant respectfully submits the basis for the outstanding rejection is clearly misconstruing the teachings in the admitted art. The basis for the outstanding rejection now appears to rely solely on the caption in Figure 8C in the specification and disregards the actual disclosure of that background art in Figures 8A-8C.

Independent claim 1 sets forth, *inter alia*, two operations. A first operation cuts off only first and second corners of only respective first and second opposite corner square cells on a square grid to form non-regular hexagonal cells. A second operation set forth in claim 1 recites "combining plural of said hexagonal cells into one combined single halftone cell". Applicant respectfully submits clearly the admitted art of Figure 8C does not disclose that second step. The other independent claims 5, 13, 17, 25, and 26 also require similar limitations.

With reference to Figure 1 in the present specification as a non-limiting example, different hexagonal cells 1-1, 1-2, and 1-3 are initially formed by cutting off only first and second corners of only respective first and second opposite corner square cells on a square grid. However, a further operation is then performed to combine in the example of Figure 1

the three hexagonal cells 1-1, 1-2, and 1-3 into the single halftone cell 1. That operation of combining such hexagonal cells 1-1, 1-2, and 1-3 into a single halftone cell 1 is believed to clearly distinguish over the applied art in Figure 8C.

In Figure 8C, each of individual hexagonal cells forms a halftone cell. In Figure 8C there is no combining of plural of the hexagonal cells into a single halftone cell.

The basis for the outstanding rejection now states in maintaining the rejection:

However, as noted above, the label of Figure 8C (HEXAGONAL CELL [singular] ON SQUARE GRID) would indicate to one of ordinary skill in the art that the set of seven non-regular hexagonal cells depicted in Figure 8C (forming a larger hexagonal pattern) represent a single half tone cell produced by the combination of the seven non-regular hexagonal cells.<sup>1</sup>

Applicant traverses the above-noted basis for the outstanding rejection as it actually ignores the full disclosure in the present application. That is, the above-noted basis for the outstanding rejection appears to look at one word in Figure 8C in isolation without considering the full disclosure of Figure 8C. Figure 8C clearly shows *different hexagonal cells* on a square grid.

Applicant's disclosure specifically recites:

Figs. *8A through 8C* illustrate the case of forming *the hexagonal cell on the 5x5 square grid* as an example. On this occasion, the corner of two pieces of pixel in the 5x5 pixel opposing to each other is removed as shown in Fig. 8A. Thereby, the *hexagonal cell of the 24 (=5x5-1x1) pixels* which is not regularly-hexagonal is formed as shown in Fig. 8B, and then, the *hexagonal cell* thus formed is arranged on the square grid without any gap as shown in Fig. 8C.<sup>2</sup>

It is clear from the above disclosure that Figures 8A and 8B show individual hexagonal cells on a 5x5 grid, and Figure 8C clearly shows plural of those individual hexagonal cells, each hexagonal cell having 24 pixels (from the 5x5 grid, minus the one pixel from the cutting off of the corners).

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<sup>1</sup> Office Action of September 13, 2005, page 4, last full paragraph.

<sup>2</sup> Present specification at page 3, lines 17-24. [Emphasis added].

Applicant respectfully submits it is clearly improper to try to interpret Figure 8C in applicant's disclosure in complete isolation and in disregard from the overall disclosure of the specification noted above in Figures 8A-8C. Figure 8C follows from the operations in Figures 8A and 8B, which also clearly show what constitutes a single hexagonal cell.

Further, the disclosure in the present specification in Figure 1 directed to features in one embodiment of the present invention clearly show how different individual hexagonal cells are combined. Such disclosures clearly distinguish over the operation in Figure 8C in the present specification.

The outstanding rejection also indicates to "[n]ote the correspondence of Figure 8C (Applicant's admitted Prior Art) and Figure 1 (the invention as described in claims 1, 5, 13, 17, 25, & 26)".<sup>3</sup> In that respect applicants note it is clear that there is a difference between the admitted art of Figure 8C and Figure 1; in the admitted art of Figure 8C there is no combination of plural of the hexagonal cells into a single halftone cell. The above-noted claims clearly reflect such differences.

In view of these foregoing comments, applicant respectfully submits each of claims 1, 2, 4-6, 8, 13, 14, 16-18, 20, 25, and 26 distinguish over the admitted art of Figure 8C.

Applicant also believes the outstanding rejection is even further disregarding features in claims 2, 4, 6, 8, 14, 16, 18, and 20. That is, those claims recite an additional operation of "combining plural single halftone cells arranged on said square grid without any gaps therebetween". Even the improper basis for the outstanding rejection citing Figure 8C in the present specification would not meet such further limitations.

That is, the basis for the outstanding rejection cites Figure 8C in the present specification as showing a single hexagonal cell. If that is the case then clearly there is no further disclosure of combining the single hexagonal cell in Figure 8C with other single cells.

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<sup>3</sup> Office Action of September 13, 2005, page 2, end of prenumbered paragraph 2.


Figure 8C clearly does not show such features. Thus, even the improper basis for the outstanding rejection would be further deficient with respect to claims 2, 4, 6, 8, 14, 16, 18, and 20, and thus those claims even further distinguish over the applied art.

In view of these foregoing comments, applicant respectfully submits each of the claims as currently written distinguishes over the applied art.

As no other issues are pending in this application, it is respectfully submitted that the present application is now in condition for allowance, and it is hereby respectfully requested that this case be passed to issue.

Respectfully submitted,

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